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6 *Counsel for Defendant*
7 *Arcadia Products, LLC*

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 LOS ANGELES WATERKEEPER, a
12 public benefit non-profit corporation,

13 Plaintiff,

14 v.

15 ARCADIA PRODUCTS, LLC, a
16 Colorado corporation,

17 Defendant.
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Case No.: 2:24-cv-03445-FLA-SSC

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint served: May 3, 2024
Current response date: July 2, 2024
New response date: August 1, 2024

1 Plaintiff Los Angeles Waterkeeper (“LA Waterkeeper”) and Defendant
 2 Arcadia Products, LLC (“Arcadia”) (collectively, the “Parties”), by and through
 3 their respective counsel of record, stipulate and agree to extend the time for
 4 Arcadia to respond to LA Waterkeeper’s Complaint (Dkt. 1) as follows:

5 1. On May 3, 2024, LA Waterkeeper provided the Complaint to counsel
 6 for Arcadia via electronic mail and requested that Arcadia waive service. On May
 7 29, 2024, Arcadia executed a Waiver of Service of Summons. Given LA
 8 Waterkeeper requested waiver of service on May 3, 2024, Arcadia is required to
 9 respond to the Complaint by July 2, 2024.

10 2. The Parties are engaged in good-faith settlement discussions and have
 11 agreed to extend Arcadia’s deadline to respond to the Complaint by thirty (30)
 12 days. Pursuant to the Parties’ agreement, Arcadia shall respond to the Complaint
 13 by August 1, 2024, unless otherwise agreed to by the Parties or approved by the
 14 Court.

15
 16 IT IS SO STIPULATED.

17 Dated: June 25, 2024

EDGCOMB LAW GROUP, LLP

18
 19 /s/ Tiffany R. Hedgpeth
 20 Tiffany R. Hedgpeth
 21 Attorney for Defendant
 22 ARCADIA PRODUCTS, LLC

23 Date: June 25, 2024

LAW OFFICE OF WILLIAM CARLON

24 /s/ William N. Carlon
 25 William Nazar Carlon
 26 Attorney for Plaintiff
 27 LOS ANGELES WATERKEEPER

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1 **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4**

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3 The undersigned attests pursuant to Local Rule 5-4.3.4 that concurrence in

4 the filing of this document has been obtained from each of the other signatories

5 hereto.

6 Dated: June 25, 2024

EDGCOMB LAW GROUP, LLP

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8 /s/ Tiffany R. Hedgpeth

9 Tiffany R. Hedgpeth

10 Attorney for Defendant

11 ARCADIA PRODUCTS, LLC

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